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8 Attorneys for United States of America

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN FRANCISCO DIVISION

12
13 UNITED STATES OF AMERICA,) NO. CR-20-249 RS
14 Plaintiff,) [FILED JUNE 22, 2020]

15 v.)

16 ROWLAND MARCUS ANDRADE,)

17 Defendant.)

18
19 UNITED STATES OF AMERICA,) NO. CR-23-140 JD
20 Plaintiff,) [FILED MAY 9, 2023]
21 v.) NOTICE OF RELATED CASE IN A CRIMINAL
22 JAPHETH DILLMAN,) ACTION

23 Defendant.)

24
25 The United States of America, pursuant to Local Criminal Rule 8-1, hereby notifies the Court
26 that the two above-captioned criminal cases are related. The two cases involve interrelated

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28 NOTICE OF RELATED CASES
U.S. v. ANDRADE, 20-CR-249 RS
U.S. v. DILLMAN, 23-CR-140 JD

1 cryptocurrency fraud schemes. Several of the same witnesses and some of the same evidence will be
2 presented at the trials in both cases. Further, Defendant Japheth Dillman is involved in both cases and
3 his conduct likely will be at issue in both trials.

4 *United States v. Andrade*, Case No. 20-cr-249 RS, involves material misstatements surrounding
5 the promotion, solicitation, and sale of the purported cryptocurrency, “AML Bitcoin.” Japheth Dillman,
6 the defendant in Case No. 23-cr-140 JD, was involved in the development and promotion of AML
7 Bitcoin and at times was described as the Chief Strategy Officer of AML Bitcoin. Further, part of the
8 fraud charged in Case No. 23-cr-140 JD involved Dillman investing in AML Bitcoin, hiding that
9 investment from Dillman’s investors, and Dillman obtaining the above-referenced position within AML
10 Bitcoin, which he used to market AML Bitcoin and sell their tokens in furtherance of the charged AML
11 Bitcoin fraud scheme. In addition, the government expects several of the same witnesses to testify in
12 both cases about similar, interrelated matters relevant to both alleged fraud schemes. Moreover, *United*
13 *States v. Dillman*, Case No. 23-cr-140 JD, arose out of the investigation resulting in the charges handed
14 down in Case No. 20-cr-249 RS. In addition to both cases involving several of the same witnesses, the
15 discovery in both cases is overlapping and much of the same evidence will be introduced in both trials.

16 Based upon these facts, the cases are related within the meaning of Local Rule 8-1(b)(1) because
17 they involve the same defendant and some of the same events and occurrences. Furthermore, the cases
18 are related within the meaning of Local Rule 8-1(b)(2) because, if heard by separate judges, the actions
19 likely would involve substantial duplication of labor by the two judges.

20 Per the requirement of Local Criminal Rule 8-1(c)(4), government counsel states that assignment
21 of these cases to a single judge is likely to conserve judicial resources and promote an efficient
22 determination of each action.

23 | DATED: August 9, 2023

Respectfully submitted,

ISMAIL J. RAMSEY
United States Attorney

/s/ Christiaan Highsmith
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Assistant United States Attorney

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